

LESTER SCHWAB KATZ & DWYER, LLP

120 BROADWAY
NEW YORK, N.Y. 10271-0071
(212) 964-6611
FAX: (212) 267-5916

| | |
|--------|-------------------------|
| SITE: | <i>Peterson Puritan</i> |
| BREAK: | <i>11-9 Evidence</i> |
| OTHER: | <i>212</i> |

17789

JONATHAN A. MURPHY
Writer's Direct Dial: (212) 341-4206
E-Mail: jmurphy@lskdnylaw.com

NEW JERSEY OFFICE
24 LACKAWANNA PLAZA
MILLBURN, N.J. 07041
(973) 912-9501

October 19, 1999

Certified Mail

David J. Newton, RPM
U.S. Environmental Protection Agency
NHRI Superfund Section
Office of Site Remediation and Restoration
1 Congress Street, Suite 1100
Mail Code, HBO
Boston, MA 02114-2023

Certified Mail

Michelle Cutler-Jones, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
Office of Environmental Stewardship
1 Congress Street, Suite 1100 (SCS)
Boston, MA 02114-2023

Re: Response of CCL Custom Manufacturing, Inc. to
EPA General Notice Letter
J.M. Mills Landfill – Peterson/Puritan, Inc. Superfund Site,
Operable Unit 2
Our File No.: 574-9042

Dear Mr. Newton and Ms. Cutler-Jones:

As you are aware, this law firm represents CCL Custom Manufacturing, Inc. in connection with recent administrative proceedings and inquiries made by the United States Environmental Protection Agency ("EPA") concerning the J.M. Mills landfill located in Cumberland, Rhode Island. By letter date stamped September 21, 1999 and received via United States first class regular mail in my office on Friday September 24, 1999 (and received at a later date by CCL Custom Manufacturing, Inc. at their Rosemont, Illinois offices), EPA has notified CCL Custom Manufacturing, Inc. of potential liability which it may incur with respect to the J.M. Mills landfill. Please accept this letter as the response of CCL Custom Manufacturing, Inc. as requested at page 5 of said General Notice letter.

Please be advised that CCL Custom Manufacturing, Inc. is willing to consider and pursue negotiations with EPA concerning Operable Unit 2 of the subject site. By expressing interest in and willingness to negotiate the issues of performance and/or financing of various response activities that might occur at the site, CCL Custom Manufacturing, Inc. in no way admits liability pursuant to CERCLA, RCRA, or any other Federal or State environmental statutes, rules or regulations, and furthermore, by expressing such willingness to negotiate, nothing herein shall be construed as constituting any legal or binding admission, agreement, stipulation or final position

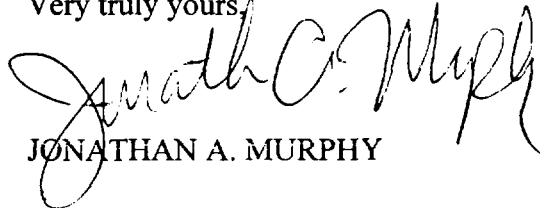
0126-0049

October 15, 1999

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on any matter in connection with the Peterson/Puritan Superfund site or any other environmental liabilities, allegations, conditions, proceedings or issues related to the site or the Martin Street plant. Furthermore, by responding herein and expressing a willingness to negotiate, this response in no way constitutes any expression of willingness to negotiate, participate in or consider involvement in other operable units at the subject Superfund site other than Operable Unit 2, as identified in the subject above-referenced General Notice letter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jonathan A. Murphy". The signature is fluid and cursive, with the first name "Jonathan" being more prominent than the last name "Murphy".

JONATHAN A. MURPHY

JAM:md/277168

cc:

Claude Cote, Esq.
State of Rhode Island
Department of Environmental Management
Office of Legal Services
235 Promenade Street
Providence, Rhode Island 02908-5767

CCL Custom Manufacturing Inc.
6133 North River Road – Suite 800
Rosemont, IL 60018
Attn: Paul Cummings, President